

LAW OFFICES

SCOTT A. SREBNICK, P.A.

SCOTT A. SREBNICK*

* ALSO ADMITTED IN NEW YORK

201 S. Biscayne Boulevard
Suite 1210
Miami, Florida 33131

Tel: 305-285-9019
Fax: 305-377-9937
E-mail: scott@srebnicklaw.com
www.srebnicklaw.com

March 13, 2020

Via ECF

Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

**Re: United States v. Avenatti, No. S1 19 Cr. 373 (PGG)
Unopposed Motion for Four (4) Day Extension
of Deadline to File Post-Trial Motions**

Dear Judge Gardephe:

I write to respectfully request an enlargement of time, until March 20, 2020, to file post-trial motions in this case. The government does not oppose this request.

On February 14, 2020, a jury convicted Mr. Avenatti. The Court set a deadline of March 16, 2020, to file post-trial motions. Sentencing is scheduled for June 17, 2020.

In late February, a complete lockdown began at MCC-New York, which lasted more than ten days as a result of allegations that a weapon had been introduced into the facility. Thus, I had to postpone a scheduled trip to New York to meet with Mr. Avenatti in early March. During that time, Mr. Avenatti had no access to a telephone or email. Attorney visits with inmates resumed only a few days ago. In the meantime, there has been a worldwide declaration of a pandemic as a result of the Coronavirus. I have been trying to schedule an attorney-client phone call with Mr. Avenatti but have been unsuccessful thus far.

I am requesting an additional four (4) days to file post-trial motions. I am hoping to have an opportunity to provide Mr. Avenatti with a draft of the post-trial motions and receive his comments before I file the motions. The government does not oppose an extension until March 20, 2020, so long as the government's deadline for filing its response is similarly extended (until April 10, 2020). Mr. Avenatti's reply would then be due April 17, 2020. Thank you for your consideration of this request.

Respectfully Submitted,
/s Scott Srebnick
Scott A. Srebnick